

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA**

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<b>Broderick William Seay, Jr.,</b>	)	<b>C/A No.: 2:17-2814-TMC-MGB</b>
	)	
	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>vs.</b>	)	
	)	<b>MOTION FOR SUMMARY JUDGMENT</b>
<b>Sheriff Al Cannon,</b>	)	
	)	
	)	
<b>Respondent.</b>	)	
	)	

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Respondent, by and through the undersigned attorneys, would respectfully move this Court, pursuant to Rule 56(b) Fed.R.Civ.P, for summary judgment.

Respectfully submitted,

ALAN WILSON  
Attorney General

DONALD J. ZELENKA  
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s/Melody J. Brown  
By: \_\_\_\_\_  
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ATTORNEYS FOR RESPONDENT

February 2, 2018.  
Columbia, South Carolina.